42-045-00070
Erin W

Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
(610) 364-8000

May 31, 2019

FedEx 7752 8180 8087

Mr. James Rebarchak
Commonwealth of Pennsylvania
Department of Environmental Protection
2 East Main Street
Norristown, PA 19401

Re: Monroe Energy, LLC – Trainer Refinery
40 CFR 63, Subpart CC: Semi-Annual Report REVISED
Reporting Period: July 1 2018 to December 31, 2018

Mr. Rebarchak:

In accordance with 40 CFR 63, Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries, section 63.655(g), the Monroe Energy Trainer Refinery hereby submits this REVISED Semi-Annual MACT CC Report for the reporting period of July 1, 2018 – December 31, 2018.

During this semi-annual reporting period, there were no reportable events in accordance with 40 CFR 63, Subpart CC.

Should you have any questions or comments regarding this report, please contact me at (610) 742-6633, or, at (610) 364-8399.

Matthew Torell, P.E.
Environmental Leader

Attachment 1 – Responsible Official Certification
Attachment 2 – MACT CC Semiannual Report

Cc: U.S. EPA, Region III
Office of Air Enforcement & Compliance Assistance
Mail Code 3AP20
1650 Arch Street
Philadelphia, PA 19103-2029

FedEx 7752 8182 1603

Responsible Official Certification

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this report is accurate and true to the best of my knowledge.

Michael Capone
Refinery Leader

31 MAY 2019
Date

Attachment 2:

MONROE ENERGY, LLC
TRAINER REFNERY
MACT CC SEMI-ANNUAL REPORT
July 1, 2018 – December 31, 2018

The Refinery MACT emission standards (40 CFR 63, Subpart CC - National Emission Standards for Hazardous Air Pollutants from Petroleum Refineries) regulate the following refinery equipment and operations:

1. Miscellaneous Process Vents.
2. Storage Vessels.
3. Wastewater
4. Equipment Leaks
5. Gasoline Loading Racks.
6. Marine Tank Vessel Loading Operations Facilities (if contiguous to the refinery).
7. Heat Exchange Systems.
8. Startup, Shutdown, and Malfunction Plans.

This semiannual report addresses the status of facility compliance with Subpart CC.

COMPLIANCE STATUS: 40 CFR 63, SUBPART CC

1. Miscellaneous process vents: **[§63. 643-645]**

The Trainer Refinery has only one "Group 1 miscellaneous process vent." The vent is located in the Alky Pretreat Unit and is designated as the "Oxidizer Disulfide Separator Vent" (Source ID 129) in the refinery's Title V Operating Permit (TVOP). The vent does not have a bypass and is directly routed to the FCC CO Boiler where product is introduced into the flame zone for destruction.

2. Storage Vessels:

Tanks: **[§63.646]**

Inspection of storage tanks that are subject to the Refinery MACT regulations have been conducted in accordance with applicable requirements. There were no Group 1 inspection findings, corrective actions, and/or repairs to report during the reporting period.

Closed Vent System and Control Device:

Spheroid Tanks 501 and 502 comply with Subpart CC by venting to a closed loop system that is routed to the Main Flare. The Main Flare System was taken out of service during the semi-annual period for planned maintenance. Maintenance performed on the flare included: replacement of the flare tip, installation of new transmitter for Flare MACT and repair/replacement of pressure relief

devices on the system. During this maintenance period, a temporary flare was used as the control device in place of the Main Flare System which met the requirements. Spheroid Tank 513 is vented to the refinery's fuel gas system, via the refinery's "Low Line". Spheroid tanks are maintained under pressure and only vent as needed via pressure control valves. No venting to the atmosphere occurred during this reporting period.

Tank Reclassification:

No storage tanks were reclassified from Group 1 to Group 2, or Group 2 to Group 1, during the reporting period.

3. **Wastewater:** **[§63.647]**

Pursuant to 40 CFR §63.647, the Trainer Refinery complies with the Wastewater Provisions of 40 CFR 63, Subpart CC by complying with 40 CFR 61, Subpart FF, Benzene Waste Operations NESHAP (BWON). All BWON reports are submitted to U.S. EPA and PADEP under separate cover, pursuant to the BWON regulations.

4. **Equipment Leaks:** **[§63.648]**

Periodic equipment leak reports are submitted quarterly and semi-annually under separate cover in accordance with §63.10(a)(6) and §63.655(d).

5. **Gasoline Loading Racks:** **[§63.650]**

There is no gasoline loading rack present at the Trainer Refinery. Therefore, the provisions of §63.650 do not apply.

6. **Marine Tank Vessel Loading Operations:** **[§63.651]**

The Marine Tank Vessel Loading Operations present at the Trainer Refinery are not subject to 40 CFR §63.651.

7. **Heat Exchange Systems:** **[§63.654]**

The Trainer Refinery is subject to the heat exchanger systems requirements that became effective in October 2012. The information required pursuant to §63.655(g)(9) is summarized in Table 1 and 2.

TABLE 1: MACT CC EXCHANGER LEAK HISTORY SUMMARY

The number of heat exchange systems in HAP service as of the close of the Reporting Period:	6
The number of heat exchange systems in HAP service found to be leaking:	1
A summary of the monitoring data that indicate a leak, including the number of leaks determined to be equal to, or greater than, the leak definitions specified in §63.654(c)(2):	See Table 2
If applicable, the date a leak was identified, the date the source of the leak was identified, and the date of repair:	See Table 2
If applicable, a summary of each delayed repair, including the original date and reason for the delay and the date of repair, if repaired during the reporting period:	**There were no exchangers on DOR or placed on DOR for the reporting period.
Estimate of potential hydrocarbon emissions for HX on Delay of Repair:	Table 3: No exchangers were on DOR for the reporting period. Estimate of potential hydrocarbon emissions is 0.0 lbs.

Table 2: Monroe Energy - Modified El Paso Monitoring Leaks and Repairs Summary

Monthly sample Location	MHGB-06
Monthly Sample Date	8/30/2018
Monthly Sample Result (ppm)	14.78
*Leak Trace	There are two exchanger bundles on CW return line MHGB-06 (PV -7885/7886) ***Leak traced using Bottle Test was performed. Leak trace results identified PV-7885 leaking
Leak Trace Reading (ppm)	358 ppm (Bottle Test)
Repair	(HX Bundle was hydro tested on 1/17/2018 and test result indicated that tubes and heads were good and that any further leak readings were indicative of fouling from another source) 9/28/2018, FCC Turnaround began and HX taken OOS. Unit was flushed and purged of product. Cooling Water lines were flushed and cleaned to remove any sludge/solids. 11/22-25/18, Unit and exchangers were placed back into service. 11/29/2018 MHGB 09 was monitored and reading was above leak threshold. Leak was traced back to PV 7885. Immediately following, bundle was taken OOS. 12/12/2018 Bundle was returned to service after hydrostatic test passed and found no leaks or issues with bundle.
Repair Verification Date	12/27/2018
Repair Verification Reading	3.44

* Traced >6.2 ppm readings to Exchanger Bank Header. All MACT CC Applicable HAP Exchangers associated with Bank header were monitored. Monitoring results for all exchangers were <6.2 leak action level and repairs were not required

** Table 1: Delay of Repair (DOR) Summary Section. If monitoring result is >62ppm, 30 Day window for tracing and full repair of leaking Exchanger(s) will be activated

*** Bottle Test for VHAP performed. Reason: Exchangers are located >50' on platform deck and transport of Air Stripper up platform steps is unsafe.

8. **Startup, Shutdown, and Malfunction Plans (SSMP):** **[§63.10(d)(5)]**

All startups, shutdowns, and malfunctions of equipment regulated by 40 CFR 63, Subpart CC which occurred during the reporting period were managed consistent with the facility's SSMP.